



Salt Division

13 May 1993

Dermott Courtney
Underground Injection Control Section
USEPA Region II
Jacob J. Javits Federal Building
New York NY 10279-0012

Ref: UIC Permit NYU 63860

Dear Mr. Courtney:

This letter follows up on our telephone conversation of this morning concerning our proposed use of an oil pad on the recently completed Well 58 at our Watkins Glen, New York salt refinery. It is our opinion that the use of limited amounts of fuel oil to control mining in a Class III well is consistent with the existing permit and should not require a major modification to that permit. As this fluid will be statically held in the annulus of the well and on the roof of the cavern, it does not fit the definition of "underground injection" given in the permit. It should be treated as any other stimulation fluid, such as drilling mud or acid solutions, which are used for well construction and maintenance. Precedent has been set in USEPA Region V, where fuel oil pads are presently utilized by Akzo Salt Inc. in Class III wells under UIC permits MI-101-3G-A002 and MI-147-3G-A001.

As the oil pressure at the wellhead is expected to reach approximately 425 psi during normal operation, and the mechanical integrity test performed in accordance with the UIC permit on 17 Nov. 93 was conducted at a wellhead pressure of only 350 psi, we propose to repeat the test at a higher pressure. The revised test pressure will be 600 psi at the wellhead, with enough oil injected into the brine-filled well to raise the pressure to this level. This is expected to require less than 100 gallons of oil.

Akzo Salt Inc.
Abington
Executive Park
P O Box 352
Clarks Summit,
Pennsylvania
18411-0352
Phone and Fax:
717/587-5131
Cable: ISCO,
Clarks Summit, PA
Telex: 83-1872



Following a 1-hour test period with less than 5% pressure loss, we will proceed with placement of the oil in the well annulus. This test will be performed after a secondary containment structure has been constructed around the wellhead and approval of this plan has been received from your office.

If you require any further information, please call me at 717/587-9353.

Sincerely,

Michael J. Schumacher
Minerals Development Engineer

cc: J.A.C. Atkins
W. Fitzgerald
J. Loose

MJS/mjs

courtney

MAY 19 1993

Michael J. Schumacher
Minerals Development Engineer
Akzo Salt, Inc.
Abington Executive Park
P.O. Box 352
Clarks Summit, Pennsylvania 18411-0352

Re: Brine Well # 58, Watkins Glen, New York

Dear Mr. Schumacher:

The U.S. Environmental Protection Agency (EPA) has reviewed the Spill Prevention, Control and Countermeasures Plan submitted by Akzo Salt for the proposed injection of fuel oil into the above-referenced well. Please address the following comments:

- EPA requires a diagram or blueprint of the planned containment system (a plan view as well as a cross-sectional view).
- Akzo proposes to inject fuel oil into the well at a pressure of approximately 425 psi, but the mechanical integrity of the well was tested at a pressure of only 331 psi (at the well's pressure gauge). Fluid may not be injected into the well at a pressure that exceeds the test pressure.
- In February 1975, fuel oil in the outer annulus of Well # 49 sprayed from a leak in a gauge line on the wellhead and reached Seneca Lake (a source of drinking water for Watkins Glen) before the leak was discovered. Please describe the steps that will be taken in the construction and maintenance of the wellhead of Well # 58 in order to prevent the leakage of oil, particularly the type of leak that occurred at Well # 49.

If you have any questions, please call Dermott Courtney of my staff at (212) 264-6897.

Sincerely,

Frank Brock
Chief
Underground Injection Control Section

cc: Peter Briggs, NYSDEC

Courtney

MAY 28 1993

Michael J. Schumacher
Minerals Development Engineer
Akzo Salt, Inc.
Abington Executive Park
P.O. Box 352
Clarks Summit, Pennsylvania 18411-0352

Dear Mr. Schumacher:

I am writing to confirm that Akzo Salt's planned injection of fuel oil into Well # 58 at the brine field in Watkins Glen, New York for the purpose of creating an oil pad to control cavern growth would require a major modification to the Underground Injection Control Permit Number NYU063860. The permit, as it now stands, allows the injection of only fresh water or fresh water mixed with waste brine. I will initiate a proposed major permit modification after I have received a request for a permit modification from Akzo and after the issues raised in my May 19 letter to you have been addressed. If you have any questions, please call Dermott Courtney of my staff at (212) 264-6897.

Sincerely,

Frank Brock
Chief
Underground Injection Control Section

cc: Peter Briggs, NYSDEC